## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OKLAHOMA

- (1) JAMES BOLES and
- (2) BARBARA BOLES,

Plaintiffs,

v.

Case No. 22-CV-00034-JFH-CDL

- (1) CARSHIELD, LLC;
- (2) NRRM, LLC; and
- (3) CONCORDIAN, LLC d/b/a AMERICAN AUTO SHIELD;

Defendants.

## MOTION TO WITHDRAW AS ATTORNEY OF RECORD

COMES NOW the law firm of SMOLEN | LAW, PLLC, counsel of record for Plaintiff, and respectfully requests that this Court enter an order allowing Hunter K. Bailey to withdraw as counsel from this case and be removed from the ECF recipient list for this particular matter. In support, the movant shows as follows:

- 1. Hunter K. Bailey previously entered his appearance as counsel for Plaintiff with Donald E. Smolen II, Laura L. Hamilton, and the attorneys of SMOLEN | LAW, PLLC.
- 2. As of October 14, 2022, Mr. Bailey is no longer employed by or associated with SMOLEN | LAW, PLLC.
- 3. Donald E. Smolen, II, Laura L. Hamilton, and SMOLEN | LAW, PLLC will remain counsel of record for Plaintiff.
- 4. No deadlines or future hearings will be adversely affected, and no party will be prejudiced by Hunter K. Bailey's withdrawal from this case.

- 5. This request is made in good faith and not for the purposes of delay or harassment.
- 6. For the Court's convenience, a proposed order granting Hunter K. Bailey's request is contemporaneously submitted herewith for the Court's consideration.

**WHEREFORE**, Hunter K. Bailey respectfully requests that the Court grant his Motion to Withdraw.

Respectfully submitted,

SMOLEN | LAW, PLLC

/s/Donald E. Smolen, II

Attorneys for Plaintiff

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## **CERTIFICATE OF SERVICE**

I, the undersigned counsel, do hereby certify that, on November 16, 2022, I electronically submitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to all counsel of record whose appearances have been entered in this case.

/s/Donald E. Smolen, II